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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 WOLFGANG R. ALTENBERG,
11 Plaintiff,
12 v.

13 AMERICAN EXPRESS NATIONAL
14 BANK, et. al,
15 Defendants.

CASE NO. 2:21-cv-00949-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR JPMORGAN
CHASE BANK, N.A. TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

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19 Plaintiff Wolfgang R. Altenberg ("Plaintiff") and Defendant JP Morgan Chase
20 Bank, N.A. ("Chase")¹ stipulate and agree that Chase has up to and including July
21 16, 2021 to respond to Plaintiff's Complaint (ECF No. 1), to provide Chase additional
22 time to investigate Plaintiff's allegations and for Chase to prepare a response. The
23 current deadline to file a response is June 25, 2021. Therefore, pursuant to LR IA
24 6-1, this stipulation is timely.

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27 ¹ By filing this Stipulation, Chase is not waiving any defense, affirmative or
28 otherwise, it may have in this matter, including, but not limited to, lack of personal
jurisdiction.

1 This is the first request for an extension, and it is made in good faith and not
2 for purposes of delay.

3 Dated: June 25, 2021

4 BALLARD SPAHR LLP

LAW OFFICE OF KEVIN L. HERNANDEZ

5 By: /s/ Joel E. Tasca

By: Kevin L. Hernandez

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10 *JP Morgan Chase Bank, N.A.*

Attorneys for Plaintiff

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17 **ORDER**

18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: June 25, 2021
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